

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: BOSTON SCIENTIFIC CORP.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2326

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' NOTICE OF VIDEOTAPED DEPOSITION OF
DESIGNEE(S) OF BOSTON SCIENTIFIC CORPORATION
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

TO: Defendant BOSTON SCIENTIFIC CORPORATION by and through its attorney of record in the above-captioned action, Jon A. Strongman, Shook, Hardy & Bacon, LLP, 2555 Grand Blvd., Kansas City, Missouri 64108.

Notice is hereby given that the Plaintiffs in the above-captioned MDL proceeding will take the deposition upon and the video examination of Defendant Boston Scientific Corporation ("BSC") on **Friday, May 8, 2015** at 9:00 Eastern Standard time and from day to day thereafter until said deposition is concluded, at **The Doubletree Hotel Westborough, 5400 Computer Drive, Westborough, MA 01581**, or such other location as may be agreed upon by counsel prior to said date. This deposition is taken pursuant to Federal Rule of Civil Procedure 30(b)(6), and BSC is hereby advised of its duty under said Rule to designate and present at said deposition the person or persons who are most knowledgeable and can testify as to the following subject matters:

BLADDER HEALTH NETWORK

All aspects, including the following:

1. The relationship between Boston Scientific Corporation and Bladder Health Network, including the origination of the relationship through its present relationship.
2. Any finances exchanged between Boston Scientific Corporation and Bladder Health Network.
3. The sharing of information between Boston Scientific Corporation and Bladder Health Network.

NOTICE TO PRODUCE

The individual(s) selected to respond to this Notice shall produce to undersigned at least 10 calendar days before the deposition any and all of the documents, digital or written materials that are responsive to the above-listed designated subjects or were used to prepare the corporate designee.

Date: March 27, 2015

By: /s/ Aimee Wagstaff
Aimee H. Wagstaff, Esq.
Andrus Wagstaff, PC
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Lakewood, CO 80226
Phone: (720) 208-9403
Co-Lead Counsel for Plaintiffs in
MDL No. 2326

CERTIFICATE OF SERVICE

I hereby certify that on **March 27, 2015**, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

Date: March 27, 2015

By: /s/ Kellie Johnson